

The factual information set forth on the Tracking Charts was submitted to the FLA by each Independent External Monitor and Participating Company and reviewed by FLA staff. It is being made available to the public pursuant to the FLA Charter in order to strengthen the monitoring process. The FLA Charter provides for regular public disclosure of the factual results of independent monitoring and the resulting specific actions taken by Participating Companies.

What is a Tracking Chart?

Compliance is a process, not an event. A Tracking Chart outlines the process involved in FLA independent external monitoring and remediation. It is used by the accredited independent external monitor, the participating company and the FLA staff to do the following:

- **Record Findings:** The independent external monitor uses the Tracking Chart to report noncompliance with FLA Code standards. The monitor should also cite the specific Code benchmark or national/local law that was used to measure compliance.
- **Report on Remediation:** The FLA participating company uses the Tracking Chart to report on the remediation program that was implemented in order to resolve the noncompliance and prevent any future violations.
- **Evaluate Progress:** The FLA uses the Tracking Chart for purposes of collecting and analyzing information on the compliance situation of a particular factory and for publication on our website. This information is updated on an ongoing basis.

What a Tracking Chart is NOT -

- An exhaustive assessment of factory conditions

Working conditions - in any type of workplace - are dynamic. Each Tracking Chart represents a survey of the factory's conditions on a specific day. Over time, a fuller picture emerges as we compile information from various sources to track the compliance progress of a factory.

- A pass or fail evaluation

The Tracking Charts do not certify whether or not factories are in compliance with the FLA Code. Monitoring is a measurement tool. The discovery of noncompliance issues is therefore not an indication that the participating company should withdraw from a factory. Instead, the results of monitoring visits are used to prioritize capacity building activities that will lead to sustainable improvements in the factory's working conditions.

- A one-time event

Each monitoring visit is followed by a remediation program, further monitoring and remediation in an ongoing process. The Tracking Charts are updated accordingly.

Note on Language

Please be advised that because FLA independent external monitors are locally-based and English is generally not their native language, the language presented may at times appear unclear to a reader who is a native English speaker. In order to preserve the integrity of the transparency process and the information we receive, our policy is to publish the original text from the monitor and participating company. However, the reader will note that we have taken the precaution to remove any identifying information about the factory that was monitored or the workers interviewed.

For example, in cases where monitors and/or participating companies have cited the actual number of workers in reference to a noncompliance issue, in order to protect the workers' identities, we have replaced the numbers with generic wording in brackets (i.e. "[some]", "[worker interviews revealed that]",etc.).

We do not disclose the name of the factory that was monitored in order to ensure that the FLA's efforts to encourage and reward transparency do not have detrimental consequences for the factory and the workers.

Instructions for Printing

The information contained in the Tracking Charts is organized by columns and rows in a table format. Due to the number and width of the columns, the charts have been formatted for legal size (8.5 x 14in.) paper. To print the charts, please make sure to select "legal" size paper from Print properties.

FLA AUDIT PROFILE	
Country	El Salvador
Factory Code	01032210A
IEM	Cotecna
Date of Monitoring visit	5/10/02
Days in facility	2 days
PC(s)	adidas & Reebok
# of workers	327
Products	Sportswear

FLA Code/Non compliance Issue		Findings	Remediation						
FLA Benchmark or Legal Reference		Cotecna's Findings	PC Remediation (July 2002)	Factory Response (July 2002)	PC Remediation (February 2003)	Factory Response (February 2003)	Documentation	PC Comments (January 2004)	PC Comments (August 2004)
1. Code Awareness									
Informed Workplace		Per FLA Principles of Monitoring, Obligations of Companies, IB, Create An Informed Workplace: Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.	Brand Code of Conduct posted in the sewing area. -The FLA Code Of Conduct has not been sent to this facility.		Workers must be verbally trained on code of conduct.	Factory management posted the Reebok Standards in Spanish and English, in a location where it can be easily read. New workers are trained on the content of the Reebok Standards at the time of hiring, and all workers receive training on codes on a monthly basis.	Factory's training modules were submitted to Reebok for verification, and are maintained in Reebok's internal files.	Training sessions are still ongoing on a monthly basis for new employees. PC compliance staff will continue to work with factory to determine training needs, in order to proactively institutionalize human rights compliance in the factory.	Worker training on PC codes is still being done during inductive interviews (at the end of the screening process). All active workers receive PC codes training reinforcement every 6 months. Furthermore, training includes verbal indications as to where PC codes are located throughout the factory and the grievances procedure.
Noncompliance Reporting Channel		Per FLA Principles of Monitoring, Obligations of Companies, IF: Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees and employees of contractors and suppliers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.	Per Audit Instrument (Pg. 19), PC has not established a noncompliance reporting channel.			Suggestion boxes, in which workers can make complaints, have been installed in a number of locations in the factory. A communication committee has been formed to address concerns placed in the box. In addition, posters with Reebok Human Rights Production Standards has been mailed to the factory for posting, which includes an address for workers to communicate concerns about workplace conditions directly to a Reebok local representative.	Pictures of the suggestion boxes have been submitted to Reebok, and are maintained in internal files.	PC compliance staff continue to work with the factory to determine whether the grievance procedure is being used by workers, and workers are free to report problems, and to monitor factory's continued response.	Suggestion boxes are being used by workers; common workplace complaints are being received and addressed accordingly. Communication committee has addressed concerns such as work clothing requests, health and safety concerns and salary increase.
2. Forced Labor									
3. Child Labor									
4. Harassment/Abuse									
Verbal Abuse		Per FLA Benchmarks IIB, Harassment or Abuse: 1. Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers. 4. Also, per FLA Benchmarks VIIB, Wages and Benefits, Hours of Work and Overtime Compensation: Negative incentives or punitive actions will not used to induce overtime in excess of code standards.	Some workers said that supervisors treat them harshly when they did not want to work overtime.	Develop and implement a plan to create an atmosphere that is not characterized by harassment, intimidation, and abuse. (1) Factory must have a functioning, written non-harassment policy (2) The policy must be communicated to the workers, management and security personnel in an open forum (3) Factory to arrange for outside experts to conduct training workshops for workers, supervisors, and management on the factory's non-harassment policy including instructions for appropriate disciplinary measures. Reebok will help the factory find the outside experts. (4) Finally, factory must demonstrate consequences of violations of the no-harassment policy.	The factory has developed a written non-harassment policy, which has been signed by the management and posted in the factory. Factory is also planning a training program for management, supervisors, security guards and workers to be completed by July 31st, 2002.	The factory has developed a written non-harassment policy, titled "Respect for the Physical Integrity, Dignity and Morality of the Person." All factory management has signed the policy, indicating that they have read and understand the policy. To communicate the policy to workers, the factory posted the policy in a prominent location of the factory. The factory also conducted a training program for management, supervisors, security guards and workers in July 2002 on the new policy.	Reebok maintains a copy of the factory's new non-harassment policy in its internal files.	PC compliance staff continue to monitor the factory to determine the effectiveness of the new policy, and to determine additional training needs to effectively institutionalize compliance with non-harassment policies.	Based on follow up visits, no cases of verbal abuse or harassment have been reported. Twice a year there is worker training on the non-harassment and/or abuse policy. In addition, workers are explained the grievances procedure for harassment or abuse cases.
Policies		Per FLA Benchmarks IIB, Harassment or Abuse: B1. Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers. B4. Employers will utilize consistent written disciplinary practices that are applied fairly among all workers. B5. Employers will provide training to managers and supervisors in appropriate disciplinary practices.	No clear written rules published.						

		Findings	Remediation						
FLA Code/Non compliance Issue	FLA Benchmark or Legal Reference	Cotecna's Findings	PC Remediation (July 2002)	Factory Response (July 2002)	PC Remediation (February 2003)	Factory Response (February 2003)	Documentation	PC Comments (January 2004)	PC Comments (August 2004)
5. Nondiscrimination									
6. Health & Safety									
Fire Safety	Per FLA Benchmarks VB, Health and Safety: B1. Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits. B3. All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	No evacuation procedures and plans posted.	Factory must develop a fire safety program that includes: - An assessment of fire safety needs - Planning for adequate and functional fire-fighting equipment, evacuation routes and fire notification systems. - Training workers to respond quickly and responsibly in case of fire. As an immediate action step, factory must -install fire alarms- Ensure that all fire safety signs are marked and clearly visible. Post the evacuation diagram in the local language.	Factory has begun developing a fire assessment plan and hopes to have a completed report by July 31st, 2002. 20 employees were trained in when and how to use fire extinguishers. (Appendix II.A). The factory has received 3 quotations for the fire alarm installation that will also be setup by July 31st. 2002. The evacuation diagram and evacuation procedure posters have been posted in the factory. (Appendix II.B)	Immediately, factory must complete the following items: (1) install fire alarms, (2) ensure that all fire safety signs are marked and clearly visible, and (3) post an evacuation diagram in the local language. Long-term, the factory must develop a fire safety program that includes: (1) an assessment of fire safety needs, (2) planning for adequate and functional fire-fighting equipment, evacuation routes and fire notification systems, and (3) training workers to respond quickly and responsibly in case of fire.	Fire assessment plans have been completed and posted in languages of all workers. Alarm and smoke detectors have been installed. Evacuation plans have been completed and posted in languages of all workers. Factory also formed a Health and Safety Committee (e.g., Emergency Brigade) of factory management and workers to address ongoing Health and Safety issues. The Committee is to be trained on First Aid this March.	Reebok has received copies of the fire assessment plan, and evacuation procedures (including diagram), which are maintained in Reebok's internal files.	Emergency procedures need continued improvement to address all items in the corrective action plan. New completion dates were established for this March. PC compliance staff will continue to work with the factory to determine additional training needs for workers and management on proper safety, first aid, and fire prevention and evacuation procedures.	Newly enhanced emergency procedures include the creation "coordinators" 18 workers who are in charge of the evacuations. Duties include the orientation of workers during an evacuation procedure. In addition, there are 10 first aid trained workers who are also able to use of fire extinguishers during a fire emergency. Newly developed emergency plan has been received and kept on file at Reebok.
	Per FLA Benchmarks VB, Health and Safety: B1. Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits. B3. All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures. B11. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	No fire alarm installed.							
	Per FLA Benchmarks VB, Health and Safety: B1. Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits. B3. All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	[Some] workers interviewed do not know how to operate exit doors.							
First Aid Kits/Medical Personnel	Per FLA Benchmarks VB, Health and Safety: B1. Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits. B4. All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Insufficient number of first aid kits, there are 2 against 4 required.	Factory must ensure that the first kits be stocked and accessible to workers. Reebok standards recommend one first aid kit for every 100 workers.	Four new first aid kits have been added to the following areas: warehouse, cutting area, maintenance and administration office. (Appendix III)			Pictures of the first aid kits have been submitted to Reebok, and are being maintained in Reebok's files.	PC compliance staff will also verify the contents of the first aid kits with a visual inspection during its next audit to the factory.	Based on follow up visits, first aid content is in compliance.

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7. Freedom of Association/Collective Bargaining	Per FLA Benchmarks VIB, Freedom of Association: B1 . Workers will have the right to establish and, subject only to the rules of the organization concerned, to join organizations of their own choosing without previous authorization. The right to freedom of association begins at the time that a worker seeks employment, and continues through the course of employment. B3 . The employer will not dismiss, discipline, or otherwise coerce or threaten workers seeking to form, join or participate in workers' organizations. B7 . The employer will not discriminate against workers who seek to exercise their right to organize and bargain collectively. B12 .The employer will not dismiss, discipline, or otherwise coerce or threaten workers because of their exercise of the right to freedom of association. When union officers are dismissed, demoted or otherwise suffer a loss of rights at work, a monitor should look with special attention at the possibility of anti-union discrimination.	[It was reported during worker interviews] that when [workers] tried to create a Union, those workers were fired.				Workers and supervisors have been trained on freedom of association code provisions, and how to comply with them. Additional training for supervisors was conducted the last week of March.	Reebok maintains a copy of the factory's new non-harassment policy in its internal files.	PC compliance staff will work with the factory to determine additional training needs on freedom of association standards and how to apply them. PC compliance staff is also investigating whether the workers can be rehired, will continue to monitor this issue. July '03: Freedom of Association (FoA) training provided to management by both Reebok and adidas June 2003. Training was provided to a group of [Agent] suppliers ([X] factories), including 1 member of [Factory] staff responsible for compliance issues. Training included a review of El Salvadoran law, ILO conventions, and brands' codes of conduct regarding FoA. Training addressed the issue of "blacklisting" and other non-compliant practices. Discussion included how a supplier would comply with the laws and codes of FoA and how to promote worker/management communication within the factory. Factory management confirmed their commitment to FoA and ensuring compliance to the national laws and brands' codes of conduct. Training also covered expectations for candidate screening and hiring practices.	Jan 21, 2004 PC compliance staff conducted a follow up on the Verite FoA training to assess worker educational improvement with regards to the Freedom of Association in their factories. PC compliance staff interviewed workers who participated in the training, as well as those who did not participate. Gathered information revealed workers have an understanding of their labor rights and advised they would like similar training to continue. Participant workers stated that they have a clear understanding of the different types of associations in their communities and workplace. Most participant workers stated they feel more comfortable about approaching management about any concern in their work environment.
8. Wages and Benefits									
9. Working Hours	Per FLA Benchmarks VIIB, Wages and Benefits, Hours of Work, and Overtime Compensation: B29 .The employer will demonstrate a commitment to reduce mandated overtime and to enact a voluntary overtime system to meet unforeseen situations. B32 .The factory will comply with all applicable laws governing work hours, including those regulating or limiting the nature and volume of work performed by women or workers under the age of 18. B39 . Overtime hours worked in excess of code standard will be voluntary.	[Some] workers interviewed felt extra hours are not voluntary	Overtime hours worked should be voluntary. Factory must provide training to workers on overtime policy application and must also ensure that supervisors do not use punitive actions or negative incentives to induce overtime.	Factory has instituted a process where workers voluntarily sign a sheet when doing overtime. Supervisors have been retrained on the overtime policy and asked to sign a statement attesting to the fact they understand the policy. (Appendix IV)		Factory instituted a voluntary overtime policy, which includes a process where workers voluntarily sign up in a sheet when requesting overtime. Supervisors were trained in August 2002 on the new voluntary overtime policy and asked to sign a statement attesting to the fact that they understand the policy.	During a follow-up audit, workers reported that they had not been working OT. Timecards corroborated this.	PC compliance staff will continue to monitor the established voluntary overtime policy, and to assess whether supervisors are using punitive or other actions to induce overtime to get around the new policy.	Based on follow-up visits, no evidence of forced overtime to report.
10. Overtime Compensation									